CERTIFICATE OF COMPLIANCE WITH PROTECTION OF CUSTOMER PROPRIETARY NETWORK INFORMATION RULES (Cont'd)

- 7. The Company's policy is to maintain records of a CPNI breach for a minimum of two years. These records will include a description of the steps the company took to prevent the breach, how the breach occurred, the impact of the breach and proof of notification to law enforcement and the customer, if applicable.
- 8. The Company has a supervisory review process regarding compliance with the FCC's rules relating to protection of CPNI for outbound marketing situations. The purpose of this supervisory review process is to ensure compliance with all rules prior to using CPNI for a purpose for which customer approval is required. Company personnel, prior to making any use of CPNI, must first consult with myself or Steve Couger regarding the lawfulness of using the CPNI in the manner contemplated. In deciding whether the contemplated use of the CPNI is proper, either Steve Couger or I consult one or more of the following: the Company's own compliance manual, the applicable FCC regulations, the FCC's Compliance Guide, and, if necessary, legal counsel. The Company's sales personnel must obtain supervisory approval from either Steve Couger or I regarding any proposed use of CPNI.
- 9. Further, both Steve Cows and I personally oversee the use of opt-in, opt-out, or any other approval requirements, or notice requirements (such as notification to the customer of the right to restrict use of, disclosure of, and access to CPNI), contained in the FCC's regulations. I also review all notices required by the FCC regulations for compliance therewith.
- 10. Steve and I also ensure that the Company enters into confidentiality agreements, as necessary, with any joint venture partners or independent contractors to whom it discloses or provides access to CPNI.
- 11. Both Steve Cowger and I personally oversee completing and submitting EB Docket No. 06-36, which is due on or before March 1 each year. The form includes explanation of any action taken against data brokers, a summary of all customer complaints, and an explanation of breaches.

Signature

Company

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Date